

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAJESH SINGH,

Defendant.

NO. MJ21-244

GOVERNMENT'S EMERGENCY
MOTION TO STAY RELEASE ORDER

Telephonic Hearing Requested

NOTE ON MOTION CALENDAR:
May 6, 2021

The United States of America, by and through Tessa M. Gorman, Acting United States Attorney for the Western District of Washington, and Matthew P. Hampton, Assistant United States Attorney for said district, respectfully files this emergency motion seeking a stay of the release order issued in this case pending the appeal of that release order pursuant to 18 U.S.C. § 3145(a). In support of this motion, the government states as follows:

1. On April 22, 2021, Rajesh Singh made his initial appearance on a criminal complaint charging him with multiple felony offenses involving the attempted sexual abuse of a child.

2. The day before, Singh travelled from New York to Washington intending to rape a young girl and film the abuse over the course of several days. The investigation was part of a sting, and the person with whom Singh made those arrangements was an

1 | undercover agent offering a fictitious child for abuse. As charged, Singh faces a
2 | minimum of thirty years in prison.

3 | 3. On May 6, 2021, Magistrate Judge Brian A. Tsuchida held a detention
4 | hearing in in this matter. After hearing argument from counsel, he determined release
5 | was appropriate in this case and fashioned an appearance bond.

6 | 4. If released, the defendant currently plans to return to the Eastern District of
7 | New York where he resides. According to defense counsel, his family has secured a
8 | flight for him that afternoon of May 7, 2021.

9 | 5. At the conclusion of the hearing, government counsel alerted the Court it
10 | intended to appeal the release order pursuant to 18 U.S.C. § 3145(a) and sought a stay.

11 | 6. Magistrate Judge Tsuchida declined to stay the order, indicating the matter
12 | should be left to the reviewing District Judge assigned to handle the government's appeal.

13 | 7. Government counsel intends to file its appeal of the release order by 5:00
14 | p.m. on May 6, 2021. The government therefore requests that this Court issue an order
15 | staying the defendant's release while the appeal of the release order is pending.

16 | DATED this 6th day of May, 2021.

17 | Respectfully submitted:
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19 | Acting United States Attorney

20 | s/ Matthew P. Hampton
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